



STATE OF NEW YORK
OFFICE OF THE ATTORNEY GENERAL

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DIVISION OF STATE COUNSEL
LITIGATION BUREAU

Writer Direct: (518) 776-2293

August 10, 2022

Hon. Miroslav Lovric, U.S. Magistrate Judge (via ECF)
Federal Building and U.S. Courthouse
15 Henry Street
Binghamton, NY 13901

Re: *Young America's Foundation et al v. Stenger et al*
Northern District of New York – 20-cv-822 (LEK)(ML)

Dear Judge Lovric:

This office represents Defendants John Pelletier, Brian Rose and Harvey Stenger (“State Defendants”). Please accept this letter as State Defendants’ status report pursuant to the Court’s text order dated July 6, 2022.

Each of the State Defendants served Second Supplemental Responses to Plaintiffs’ Request for Production of Documents on June 30, 2022. To date, Defendants have disclosed 1094 pages of documents. Certain names and contact information for non-party individuals who either wrote “opinion emails” about the ‘Laffer Event’ and ‘tabling event’ after the events, along with names, dates of birth and BU student numbers for arrested non-party individuals have been redacted from copies of e-mails sent to Plaintiffs’ counsel. Plaintiffs have objected to the redactions, and we are currently attempting to mutually resolve these objections before resorting to motion practice.

We have reached out to Plaintiffs’ counsel about scheduling depositions of Plaintiff representatives, and hope to have dates on the calendar in the near future.

The parties have agreed on Steve Helmer, Esq. of Mackenzie Hughes, LLP as a mediator in this matter, and have an August 24, 2022 mediation session scheduled.

Thank you for your consideration to this report.

Very truly yours,

s/ John F. Moore

John F. Moore
Assistant Attorney General
Bar Roll No. 105188

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cc (via ECF): All Counsel